

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:  
Marc Julien

**Debtor**

Bank of America, N.A., or its Successor or Assignee

**Movant**

vs.

Marc Julien  
Jack N. Zaharopoulos

**Respondents**

CHAPTER 13

CASE NO.: 20-00544

**ANSWER TO MOTION FOR RELIEF  
ON BEHALF OF DEBTOR**

AND NOW comes the Debtor, Marc Julien, by and through his attorneys, and answers the Motion for Relief from Automatic Stay by Bank of America, N.A., as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Denied. After reasonable investigation, Debtor is without information sufficient to respond to this averment.
7. Denied. After reasonable investigation, Debtor is without information sufficient to respond to this averment.
8. Denied. After reasonable investigation, Debtor is without information sufficient to respond to this averment.
9. Denied. After reasonable investigation, Debtor is without information sufficient to respond to this averment.
10. Denied. After reasonable investigation, Debtor is without information sufficient to respond to this averment.

11. Denied. After reasonable investigation, Debtor is without information sufficient to respond to this averment.
12. Denied. Legal conclusion to which no response is required.
13. Admitted.
14. Denied. After reasonable investigation, Debtor is without information sufficient to respond to this averment.

**WHEREFORE**, Debtor respectfully requests an Order of this Court denying the Motion of Bank of America, N.A. for Relief from the Automatic Stay.

Respectfully Submitted,

**NEWMAN WILLIAMS, P.C.**

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